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JAN 31, 2025, 7:27AM
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January 31st, 2025

Honorable Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: Michael Berg's Response Letter – Valentin Order
Docket Entry #69 Etan Leibovitz v. Nicole Procida et al,
No. 24 Civ. 4779 (AMD) (LB)

Dear Judge Bloom,

I respectfully submit this letter to notify the Court that this morning, Michael Berg was served with my second motion for sanctions as a result of his submission of the above-referenced letter.

Respectfully submitted,

Etan Leibovitz

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